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*To enhance mission performance, TSA is committed to promoting a culture founded on its values of Integrity, Innovation, and Team Spirit.*

**REVISION:** This revised directive supersedes TSA MD 200.9, *Vital Records Program*, dated January 13, 2010.

**SUMMARY OF CHANGES:** Section 3 Authorities, revised; Section 4 Definitions, updated definitions; Section 5, Responsibilities, added Senior Agency Official, revised to reflect the current TSA records management responsibilities.

1. **PURPOSE:** This directive provides TSA policy and procedures for identifying, preparing and inventorying vital records and managing their transfer, maintenance and disposition under an agency *Vital Records Program*.
2. **SCOPE:** This directive applies to all TSA employees, contractors and program offices with vital records responsibilities.
3. **AUTHORITIES:**
  - A. 36 CFR, Part 1236, Management of Vital Records, revised July 1, 2003
  - B. 44 USC, Chapter 3101, 3102(2), and 3103
  - C. EO 12656, Part 1, Section 202, Assignment of Emergency Preparedness Responsibilities, November 18, 1988, as amended
  - D. Executive Order 13231 Critical Infrastructure Protection in the Information Age
  - E. National Security Presidential Directive (NSPD 51)/Homeland Security Presidential Directive (HSPD 20)
4. **DEFINITIONS:**
  - A. Approving Official: A senior management official designated by the head of TSA, or his/her designee, with authority to approve actions for a TSA Headquarters (HQ) Office (i.e., Assistant Administrators, Deputy Administrators, Federal Security Directors, Assistant Federal Security Directors, or equivalents).
  - B. Continuity of Operations (COOP): A planning effort and supporting programs designed to assure that the capability exists to continue essential agency functions in the event of an emergency; including management of records essential for agency operations that are protected and accessible in the event of an emergency.

- C. Disaster: An unexpected occurrence inflicting widespread destruction and distress and having long-term adverse effects on agency operations. Each agency defines what a long-term adverse effect is in relation to its most critical program activities.
- D. Emergency: A situation or occurrence of a serious nature, developing suddenly and unexpectedly, demanding immediate action, and which is generally of short duration (e.g., interruption of normal agency operations for a week or less involving electrical failure or minor flooding caused by broken pipes).
- E. Emergency Operating Records: Vital records essential to the continued functioning or reconstitution of an organization for the duration of an emergency and comprise records necessary for the mobilization and protection of material and manpower resources, services, and systems; the maintenance of public health, safety, and order. Vital records include: emergency plans and directives, Orders of Succession, Delegations of Authority, staffing assignments, selected program records needed to continue the most critical agency operations, as well as related policy or procedural records that assist agency staff in conducting operations under emergency conditions and for resuming normal operations after an emergency. These records need to be available in paper copies during an emergency; hence they should be duplicated and stored off-site.
- F. Legal and Financial Rights Records: Vital records essential to protect the legal and financial rights of the Government and of the individuals directly affected by its activities (e.g., accounts receivable records, Social Security records, payroll records, retirement records, insurance records, legal records concerning ongoing litigation, contractual obligations and money the government owes or is owed). Legal and financial rights records should be protected, but it is not mandatory for them to be available during an emergency. They do not have to be duplicated and stored off-site.
- G. Office: A major TSA organizational element headed by an Approving Official with delegated authority and assigned scope and responsibility for subordinate program offices.
- H. Program Office: Also referred to as a functional area, a subordinate element of an HQ Office.
- I. Records Liaison: A TSA employee, appointed by an approving official above the division level, via [TSA Form 230, Records Liaison Appointment](#), with the authority to serve as a designated representative and liaison contact for their respective HQ office or field location (e.g., Airport, Mission Support Center, etc.) regarding records management activities and issues. Records Liaisons, in coordination with guidance provided by IMPS, assist with the organizing and maintaining of an office's records and ensure that recordkeeping best practices are followed. They act as a point of contact for, and provide guidance to, Records Custodians at the division level and below.

- J. **Vital Records:** Records essential to support the agency's continued functioning or reconstitution in the event of an emergency. Vital Records contain critical information needed to re-establish the organization that could not be replaced at any cost, or whose loss or destruction would result in grave business consequences, such as loss of customer base or production capability. Vital Records also include records essential to protecting the rights and interests of that organization and of the individuals directly affected by its activities. Generally, only three to seven percent of an agency's information is considered a vital record.
- K. **Vital Records Plan:** Document identifying an organization's vital records via [TSA Form 228, Vital Records Plan](#) and [TSA Form 231, Vital Records Certification](#), providing information sufficient to properly account for and ensure that those records are available during a disaster or emergency.
- L. **Vital Records Program:** The compilation of agency policies, procedures, forms, plans and associated documents and resources necessary to effectively identify, use and protect vital records.

## 5. RESPONSIBILITIES:

- A. The Administrator is responsible for establishing and maintaining an agency *Vital Records Program* to safeguard TSA vital records. Federal records management authorities require the head of each agency to make and preserve records that contain adequate and proper documentation of the organization and to perform national security emergency preparedness functions.
- B. Senior Agency Official (SAO) is responsible for:
  - (1) Leading, planning, guiding, and providing general oversight of Vital Records management for the TSA, and its incorporation into the broader information resources management framework.
  - (2) Implementing a records management program that is consistent with statutory and regulatory requirements, and TSA directives, policies and procedures.
  - (3) Providing on-going evaluations of the TSA Vital Records Program to assess its effectiveness.
- C. Approving Officials are responsible for:
  - (1) Ensuring office compliance with and accountability for the *Vital Records Program*.
  - (2) Ensuring the establishment of a Vital Records Program which consists of this policy statement and a set of specific procedures to provide for the preservation of Vital Records pursuant to an approved Vital Records Plan.
  - (3) Ensuring the establishment of an emergency operating plan and a disaster mitigation and recovery plan for Agency Vital records that is an integral part of the Agency Continuity of Operations Plan.
  - (4) Supports the Vital Records Program by securing resources to safeguard TSA Vital Records, securing offsite space and information technology support as necessary.

- (5) Ensuring the appointment of a Records Management Lead and supporting Records Custodians using [TSA Form 230, Records Liaison Appointment](#) as appropriate.
  - (6) Coordinating the transport of non-emergency records (i.e., legal and financial rights records) at off-site locations.
- D. Office of the Chief Counsel (OCC) is responsible for providing legal review of vital records identified by program offices to ensure the legal rights and interests of individual citizens and the Government are protected.
- E. Office of Law Enforcement/Federal Air Marshal Service (OLE/FAMS) is responsible for:
- (1) Providing coordination, oversight and direction to safeguard classified and sensitive unclassified information at COOP sites.
  - (2) Providing emergency preparedness guidance, oversight and direction sufficient to support the Vital Records Program.
  - (3) Ensuring that emergency operating records are available at TSA COOP sites, and that all emergency operating records secured at other off-site locations are appropriately safeguarded against unauthorized access.
  - (4) Coordinating or providing for, as necessary, appropriate transport of emergency operating records bulk shipments and their secure storage at TSA COOP sites.
- F. Office of Information Technology (OIT) is responsible for:
- (1) Providing information technology (IT) support sufficient to support the effective and efficient production, storage, maintenance and retrieval of vital records in electronic formats.
  - (2) Providing technical advice and guidance by reviewing and assessing the hardware and software required to support the *Vital Records Program*.
  - (3) Taking steps to eliminate IT vulnerabilities that could threaten agency vital records.
  - (4) Procuring, installing, and upgrading, as appropriate, IT systems, software and equipment sufficient to support the *Vital Records Program* including the implementation of redundant IT systems.
  - (5) Ensuring accessibility and redundancy of electronic systems in an emergency.
- G. Information Management Program Section (IMPS) is responsible for:
- (1) Developing and coordinating reviews of the *Vital Records Program* policy and procedures.
  - (2) Assisting and advising HQ Offices in identifying vital records necessary for implementation of their respective emergency operations plans.

- (3) Conducting periodic evaluations and reviews/audits of the *Vital Records Program*.
- (4) Providing technical direction to records liaisons, in compliance with this Directive.
- (5) Reviews and certifies the vital records plans are completed/updated annually.

H. Business Management Office (BMO) Directors are responsible for:

- (1) Managing and interacting with appropriate BMO staff, HQ Office contacts, and other TSA personnel necessary to support records management policy, procedures, requirements and standards.
- (2) Ensuring qualified records liaisons are appointed and trained to ensure timely and effective records management support and oversight.

I. Records Liaisons are responsible for:

- (1) Ensuring the proper Vital Records Plan includes the documentation and identification of vital records for their division or field office locations.
- (2) Collecting, properly securing and maintaining a master set of Federal and TSA directives, handbooks, the Vital Records Plan, forms and other issuances, administrative and technical, pertinent to their HQ Offices.
- (3) Leading and coordinating reviews, determinations and inventorying of vital records.
- (4) Completing applicable records management training, briefings and other activities, as directed/required, within the time and manner prescribed.
- (5) Effectively communicating records liaison roles and responsibilities to their respective HQ Office staff.
- (6) Reviewing and submitting appropriate forms and documentation related to records management and the *Vital Records Program* to the Agency Records Officer (ARO).
- (7) Ensuring proper coordination for the collection and transfer of vital records to the TSA COOP sites or other appropriate off-site locations in a timely manner.
- (8) Conducting periodic inventories of vital records and updating the Vital Records Plan and coordinating with the ARO.

**6. POLICY:**

- A. Offices shall comply with and support the *Vital Records Program*, and ensure that their respective emergency operating records and legal and financial rights records vital to the continuity of essential TSA activities are properly identified, safeguarded and accessible.

- B. Offices shall review, update and revise their Vital Records Plans by completing the appropriate *Vital Records Program* forms ([TSA 228A, Vital Records Plan Supplemental](#) and [TSA 229 Vital Records Identification Schedule](#)) in a timely manner, as needed, and not less than annually, subject to periodic audits by the ARO and other appropriate officials.
- C. Offices shall ensure that vital records are evaluated on the basis of their essential needs in carrying out emergency operations or in protecting the rights and interests of citizens and Government, and not based on their value as permanent records.

**NOTE:** The records must be accessible and sufficiently documented so that anyone at the TSA COOP sites or other off-site locations can appropriately access and interpret the information and not just accessible for those individuals who would generally use them.

- D. Offices shall ensure that their vital records are preserved, catalogued, and easily retrievable in usable condition and are maintained in the appropriate medium for ready access at the TSA COOP sites or other appropriate off-site locations.
- E. Offices shall coordinate with the ARO when transferring emergency operating records and legal and financial rights records to the TSA COOP sites or other appropriate off-site locations.
- F. Offices shall consider the informational content of records series and electronic records systems when identifying vital records such as emergency plans and related records, and those records that would be needed to continue operations and protect legal and financial rights.

**NOTE:** Only the most recent and complete source of the vital information should be treated as the vital record.

- G. Offices shall use [TSA Form 228, Vital Records Plan](#) and [TSA Form 228A, Vital Records Plan Supplemental](#), for their emergency plans and a corresponding [TSA Form 229, Vital Records Identification Schedule](#) must be provided for each record item noted on the TSA Forms 228 and 228A(s).

## 7. PROCEDURES:

- A. Records Liaisons: Submit vital records documents, forms, and direct all inquiries to the ARO via [TSARecords@tsa.dhs.gov](mailto:TSARecords@tsa.dhs.gov).
- B. Duplication and Storage:
  - (1) Computer backup tapes, redundant IT systems, CD and/or DVD read/rewrite, memory sticks or external hard drives created in the normal course of system maintenance or other electronic copies that may be routinely created in the normal course of business may be used as the vital record copy. Hard copy records may be transferred for maintenance as microform.

- (2) When HQ Offices choose duplication as a protection method, the copy of the vital record stored at the TSA COOP site or other off-site location should be a duplicate of the original record. While the original copy of the vital records must be retained in accordance with the records disposition schedule, the duplicate copy at the TSA COOP site or other off-site location may be destroyed or deleted when superseded, obsolete or no longer needed as long as the original records have been identified and preserved.

**C. Review and Retrieval:**

- (1) Ensure that retrieval procedures are sufficiently documented in such a way that only minimal efforts are required to locate the vital records information, so individuals unfamiliar with the records who may need to use them during an emergency or disaster are able to review and retrieve those records.
- (2) Coordinate with appropriate HQ Offices to ensure that all documentation, materials (parts) and equipment needed to access vital records are available at the TSA COOP site or other off-site location.

**D. Maintenance and Update:**

- (1) Establish and maintain appropriate files containing vital records plans, forms, and references, subject to internal TSA office audits.
- (2) Review and update master sets consistent with the Vital Records Plan and certify quarterly (fiscal year) using [TSA Form 231, Vital Records Certification](#).

8. **APPROVAL AND EFFECTIVE DATE:** This policy is approved and effective the date of signature unless otherwise specified.

**APPROVAL**

*Signed*

December 27, 2016

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Stephen W. Rice  
Assistant Administrator for Office of Information  
Technology/Chief Information Officer

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Date

**EFFECTIVE**

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Date

Distribution: Assistant Administrators and equivalents, Emergency Preparedness Staff,  
Business Management Office Directors, and Records Liaisons  
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